

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	
)	Chapter 15 Case
FAIRFIELD SENTRY LIMITED, et al.,)	
)	Case No: 10-13164 (SMB)
Debtors in Foreign Proceedings.)	
)	Jointly Administered
)	
FAIRFIELD SENTRY LTD. (IN LIQUIDATION), et al.,)	
)	Adv. Pro. No. 10-03496
Plaintiffs,)	
)	Administratively
-against-)	Consolidated
)	Under This Matter
THEODOOR GGC AMSTERDAM, et al.,)	
)	ORAL ARGUMENT
Defendants.)	REQUESTED
)	
THIS DOCUMENT APPLIES TO:)	
)	Adv. Pro. Nos. Listed on
ALL ADVERSARY PROCEEDINGS LISTED IN)	Exhibit A Attached
EXHIBIT A)	Hereto

NOTICE OF MOTION TO DISMISS ON *FORUM NON CONVENIENS* GROUNDS

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Philip Kite, dated January 25, 2017 and the exhibit thereto, the accompanying Supplemental Memorandum of Law of Defendants Listed on Exhibit A Hereto in Opposition to Plaintiffs' Motion for Leave to Amend and in Support of Defendants' Motion to Dismiss on Grounds of *Forum Non Conveniens* and all exhibits thereto, and all prior pleadings and proceedings had herein, the FNC Defendants (as set forth in Exhibit A hereto) will move this Court for an order dismissing with prejudice the complaints filed by the Liquidators of Fairfield Sentry Limited, Fairfield Sigma Limited, and Fairfield Lambda Limited, on the basis of the doctrine of *forum non conveniens*.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 7012(b) of the Federal Rules of Bankruptcy Procedure, Defendants do not consent to the entry of final orders or judgment by this Court.

Dated: New York, New York
January 27, 2017

Respectfully submitted,

HOGAN LOVELLS US LLP

By: /s/ Marc J. Gottridge
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*Attorneys for Defendants Barclays Bank
(Suisse) S.A., CaixaBank, S.A. as Successor by
Merger to Barclays Bank S.A. (named herein as
Barclays Bank SA Madrid), and Zedra Trust
Company (Jersey) Limited (named herein as
Barclays Private Bank & Trust (Channel Islands)
Limited, and with authority from attorneys for the
Defendants in the respective adversary proceedings
referenced in Exhibit A hereto*

TO: All Counsel of Record